

Exhibit C

Fairfax Supplemental Rebuttal Report

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House Standing
Committee on Redistricting, et al.,

Defendants.

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as the
President Pro Tempore of the North Carolina
Senate, et al.,

Defendants.

Civil Action No. 23 CV 1104

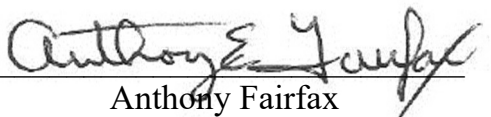
**SUPPLEMENTAL REBUTTAL EXPERT REPORT OF ANTHONY E. FAIRFAX
on the Development of Demonstrative Plans for
State Senate and House Districts for the State of North Carolina**

March 31, 2025

1. I previously submitted an Expert Report on August 1, 2024, which I corrected on October 28, 2024 (“Fairfax Report”) and which sets forth my qualifications and compensation in this matter. I also submitted a Reply report on October 17, 2024 (“Fairfax Reply Report”). I was asked to review the supplemental report prepared by Dr. Michael Barber and submitted on March 17, 2025 (“Supplemental Report”).
2. Dr. Barber’s Apportionment Analysis in Section 5 of his Supplemental Report put forth that, in offering alternative districts in my Fairfax Reply Report, I “fail[ed] to consider the partisan implications” of changes made (p. 32). As made clear in my initial Fairfax Report and my Fairfax Reply Report, I have analyzed in my apportionment analysis whether deviations among districts within county clusters are justified by any traditional redistricting criteria, including equal population, contiguity, compactness, respect for political subdivisions, and preserving communities of interest. *See* Fairfax Report at Section 13, Fairfax Reply Report at Section 5. I found that simple modifications could be made within these clusters which would lower the overall population deviation without performing any worse on any traditional redistricting criteria, and in some cases, performing better. *See generally* Fairfax Reply Report at Section 5. Dr. Barber’s observations regarding the partisan implications of alternative configurations for these districts do not alter my conclusion that the deviations I observed are not justified by any traditional redistricting criteria.
3. Overall, after reviewing the analysis of Dr. Barber in his Supplemental Report, my opinions remain the same as in my Fairfax Report and Fairfax Reply Report.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct according to the best of my knowledge, information and belief.

Dated: 3/31/25

Signed: 
Anthony Fairfax